

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In Re: Mark E. McLure, and	:	Bankruptcy Case No.: 19-20310-CMB
Erica S. Quiggle,	:	
	:	Chapter 13
Debtors.	:	
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Mark E. McLure, and	:	
Erica S. Quiggle,	:	Document No.:
	:	
Movants,	:	Related to Document No.:
	:	
v.	:	Related to Claim No.: 2
	:	
Freedom Mortgage Corporation,	:	
	:	
Respondent.	:	

DEBTORS' DECLARATION OF SUFFICIENT PLAN FUNDING

Pursuant with the Notice of Mortgage Payment Change filed on November 8, 2020, after reasonable investigation and upon review of the existing Chapter 13 Plan, it appears to Debtors that the existing payment is sufficient to fund the Plan even with the proposed change for December 1, 2020.

The new post-petition monthly payment payable to Respondent is \$1,531.49, effective December 1, 2020, per the notice dated November 8, 2020. The Debtors' Plan payment provides for a monthly payment to Freedom Mortgage Corporation of \$1,542.15. Therefore, Debtors' Plan remains sufficient.

Respectfully Submitted,

Date: November 13, 2020

/s/Brian C. Thompson
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